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USDOC FOR 532/OEA/MNICKSON/ADYSON
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: BMGT BEXP HK ETRD ETTC
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: RICH LONG
LOGISTICS, LTD

REF: A) USDOC 00153

¶11. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) conducted a post shipment-verification (PSV) at Rich Long Logistics, Ltd., O/B Uni Shine Marine Co. Ltd., 6/F Wah Tat Industrial Center, 8-10 Wahsing Street, Hong Kong (Rich Long). The items in question for this PSV are outboard marine propulsion engines and a bow thruster system exported to Rich Long on or about February 28, 2007. While the applicable export control documentation does not list an export control classification number (ECCN), it is likely that these items can be shipped license free to virtually all destinations and end-users worldwide except certain sanctioned countries and restricted entities and individuals. The exporter was Wesmar Western Marine Electronics of Woodinville, Washington.

¶13. According to the Hong Kong Companies Registry, Rich Long has been in existence since 2001. Its paid up share capital is the Hong Kong equivalent of USD 12500. The Hong Kong Companies Registry lists two Hong Kong residents as directors, namely Kao, Shih Yi and Lin, Chien Kuo Gery.

¶14. A review of the company's web site (www.RichLonglogistics.com) reveals that Rich Long is a logistics services company with operations in Hong Kong, Taiwan and mainland China. It provides a range of services including warehousing, customs operations, insurance, global tracking and computerization, among others.

¶15. On February 26, 2009, ECO accompanied by Commercial Assistant, Carrie Chan, visited Rich Long and met with Ms. Carmen, an account manager. She provided background on the Rich Long consistent with the information on the company's web site. From ECO's observation, it appears that approximately 20-25 staff work at the company's office. Ms. Carmen stated that Rich Long provides a range of freight forwarding and related services for the China market. When asked, Ms. Carmen did not appear to know anything about Hong Kong Strategic Commodities licenses and ECO assumes the company does not apply for licenses. Note: Only items on Hong Kong's strategic commodities control list would require a license for import into Hong Kong or export from Hong Kong. ECO informed Ms. Carmen that U.S. export controls apply to U.S. origin items and subsequently provided her with additional information about those controls.

¶16. As to the specific transaction in question, Ms. Carmen stated that she was unable to locate the underlying documentation for this shipment. She stated that shipping documentation is kept on hand for one year and then shipped to the company's warehouse in the mainland. She further stated that the customer and ultimate consignee, Uni Shine Marine, is a regular customer of Rich Long. It manufactures boats in Zhuhai, mainland China. Ms. Carmen stated that she is unaware of Uni Shine's customers. A web search of Uni

Shine reveals that it is apparently an affiliate or subsidiary of Taiwan firm Her Shine Marine which, among other things, builds yachts in partnership with Jefferson Marine in Jeffersonville, Indiana. ECO has no reason to doubt that the items were actually shipped to Uni Shine.

¶7. Based on the information noted above, ECO believes the items did reach the buyer listed on the applicable export documentation (namely Uni Shine Marine Co. Ltd.). ECO is less sanguine about the suitability of Rich Long to be the recipient (as logistics provider) of controlled U.S. origin technology. ECO can make no determination as to the suitability of the apparent ultimate consignee Uni Shine Marine Co. Ltd.